

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

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| In re: | PROMESA Title III |
| THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD OF PUERTO RICO, as representative of THE COMMONWEALTH OF PUERTO RICO <i>et al.</i> , | Case No. 17-BK-3283 (LTS) (Jointly Administered) |
| Debtors. ¹ | Adversary case no. 19-00266 |
| THE SPECIAL CLAIMS COMMITTEE OF THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO ACTING BY AND THROUGH ITS MEMBERS, | |
| and | |
| THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF THE COMMONWEALTH OF PUERTO RICO, | |
| as co-trustees respectively, of | |
| THE COMMONWEALTH OF PUERTO RIO, | |
| Plaintiffs. | |
| v. | |
| FAST ENTERPRISES LLC, | |
| Defendant. | |

JOINT MOTION REQUESTING ENTRY OF CONSENT ORDER AND JUDGMENT

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481) ("Commonwealth"), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523 (LTS)) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

To the Honorable United States District Court Judge Laura Taylor Swain:

Drivetrain, LLC in its in its capacity as the trustee of the Commonwealth Avoidance Actions Trust (the “Trustee”), and Fast Enterprises LLC as defendant in connection to Adversary Proceeding No. 19-00266 (LTS) (the “Defendant”, and together with the Trustee, the “Parties”), through their respective legal counsel, hereby file this *Joint Motion Requesting Entry of Consent Order and Judgment* and aver as follows:

On July 17, 2023, the Parties convened and reached an agreement extrajudicially. The Parties agreed to dismiss with prejudice all claims and defenses that have been raised or could have been raised in the above-captioned Adversary Proceeding in exchange for an agreed-upon payment to the Trustee to the Trustee. Further, the Parties agreed to the Court’s entry of the *Consent Order and Judgment* attached as Exhibit A.

WHEREFORE, the Parties respectfully request that this Honorable Court take notice of the foregoing and enter the Consent Order and Judgment in the form provided.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 3rd day of August, 2023.

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